## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

UNITED HEALTHCARE SERVICES, INC., UNITED HEALTHCARE INSURANCE COMPANY, AND UMR, INC.,	)
COMPANT, AND UMR, INC.,	)
Plaintiffs,	) Case No. 3:21-cv-00364
v.	)
TEAM HEALTH HOLDINGS, INC.,	)
AMERITEAM SERVICES, LLC, and HCFS	)
HEALTH CARE FINANCIAL SERVICES,	)
LLC,	)
D 0 1 .	)
Defendants.	)

## Notice Regarding Stipulated Extension of Expert Disclosure Deadline

Defendants, Team Health Holdings, Inc., AmeriTeam Services, LLC, and HCFS Health Care Financial Services, LLC, through their respective counsel, hereby notify the Court of the Parties' stipulation to extend expert disclosure deadlines.

Under the current Amended Scheduling Order in this case [Doc. 77], Plaintiffs were to make expert disclosures on September 13, 2024. Defendants' expert disclosure deadline was set for November 15, 2024. Id. The Court's Scheduling Order also states that "[t]he parties may agree to extend the deadline for any disclosure required by Rule 26 or this scheduling order, but such agreement must be in writing to be effective." [Doc. 43, ¶ 5(i)]. On August 6, 2024, Plaintiffs requested additional time for their disclosures. After discussion, the parties agreed in writing to suspend and extend the expert disclosure deadlines for all parties pending the parties' joint request for a conference to discuss an overall extension of the Scheduling Order. The parties informed the Court of this agreement in their October 1, 2024, motion for a status conference, [Doc. 83], and on

November 13, 2024, the Court granted the joint motion and set a status conference for November 21, 2024 [Doc. 86].

Pending further discussion of an overall schedule at the upcoming November 21 conference, and for good cause pursuant to Rule 16(b)(4), Defendants hereby notify the Court of the parties' stipulation to extend Defendants' November 15 expert disclosure deadline to such time as the Court may determine at or following the November 21, 2024, scheduling conference.

Respectfully submitted,

BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, P.C.

## /s/ Gary C. Shockley

Gary C. Shockley (BPR 010104) Caldwell G. Collins (BPR 028452) 1600 West End Avenue, Suite 2000 Nashville, Tennessee 37203 (615) 726-5704 (phone) (615) 744-5704 (fax) gshockley@bakerdonelson.com cacollins@bakerdonelson.com

Nora A. Koffman (BPR 038025) 602 Sevier Street, Suite 300 Johnson City, TN 37604 (423) 928-0181(phone) nkoffman@bakerdonelson.com

Matthew S. Mulqueen (BPR 028418) 165 Madison Avenue, Suite 2000 Memphis, TN 38103 (901) 526-2000 (phone) mmulqueen@bakerdonelson.com

and

Martin B. Goldberg (FL BPR 827029) (Admitted pro hac vice) Justin C. Fineberg (FL BPR 53716)

(Admitted *pro hac vice*) Lash & Goldberg LLP 2500 West Road, Suite 2200 Fort Lauderdale, FL 33331 (954) 384-2500 (phone) mgoldberg@lashgoldberg.com jfineberg@lashgoldberg.com

Counsel for Defendants Team Health Holdings, Inc.; AmeriTeam Services, LLC; and HCFS Health Care Financial Services, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify under Rule 5 of the Federal Rules of Civil Procedure that true and exact copies of the foregoing Notice Regarding Stipulated Extension of Expert Disclosure Deadline was served on the following counsel of record via operation of the Court's electronic filing system on this 14<sup>th</sup> day of November, 2024:

Michael J. King Kendell Garrett Vonckx Paine Tarwater Bickers LLP 900 S. Gay Street, Suite 2200 Knoxville, TN 37902 mik@painebickers.com kmg@painetarwater.com

Jamie R. Kurtz Nathaniel J. Moore Robins Kaplan LLP 800 LaSalle Avenue, Suite 2800 Minneapolis, MN 55402 ikurtz@robinskaplan.com nmoore@robinskaplan.com

Paul D. Weller Robins Kaplan LLP 900 Third Avenue, Suite 11900 New York, NY 10022 pweller@robinskaplan.com

/s/ Gary C. Shockley Gary C. Shockley